

October 1, 2007

Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Attn: Diane Mason  
445 12<sup>th</sup> Street, SW, Room 3-A503  
Washington, D.C. 20554

Re: Telecommunication Relay Services State Re-certification Application,  
CG Docket No. 03-123

Dear Ms. Mason,

Please find enclosed a request for re-certification of Tennessee's Telecommunication Relay Service ("TRS"), by the Tennessee Regulatory Authority ("Authority"), the state agency charged with regulating telecommunication services in Tennessee.

In addition to a narrative description of the state's TRS, I have included documentation to support the statements made in the narrative. I have included a copy of Tennessee's most recent Request for Proposals to provide TRS and CapTel along with the Authority's Final Order that established TRS standards. Tennessee recognizes the extreme importance of the provisioning of relay services and respectfully requests approval of re-certification. If you have any questions or need additional documentation, please contact Miki Klein at 615-741-3939, extension 206.

Sincerely,

Eddie Roberson, PhD  
Chairman

cc: Director Pat Miller  
Director Ron Jones  
Director Sara Kyle

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of Telecommunication Services for Individuals with Hearing and Speech Disabilities, and CC Docket No. 90-571 the Americans With Disabilities Act of 1990 (ADA) Pursuant to the Federal Communications Commission (FCC) Report and Order Dated July 26, 1991 and CG Docket No. 03-123

Application for FCC Re-certification of the State of Tennessee's  
Telecommunication Relay Services

**I. Introduction**

**A. General**

This application is submitted in response to the mandatory minimum standards set forth in Section §64.604 of the FCC's Report and Order released July 26, 1991, amended by FCC's Order on Reconsideration released June 5, 2000 that established rules to govern the provisions of Telecommunication Relay Service ("TRS") in both the intrastate and interstate jurisdictions in accordance with the federal mandate found in the ADA.

States have the option of applying for renewal of certification one year prior to the expiration of the current certification that will expire on July 26, 2008. State renewal of certification means that the certified state is granted the authority to continue to operate and control its own intrastate TRS center on condition that FCC minimum standards are maintained.

The Tennessee Regulatory Authority requests the renewal of the Tennessee Telecommunication Relay Services ("TN TRS") certification. The Tennessee Regulatory Authority is the governmental entity responsible for developing and implementing TRS in Tennessee.

## B. Tennessee's TRS – Background

In September 1990, the Tennessee Public Service Commission (“TPSC”), now known as the Tennessee Regulatory Authority (herein referred to as the “Authority”) recognized the need to provide telephone-assisted service to people with certain disabilities. To fulfill this need, TRS was established in Tennessee that was designed to assist citizens with speech and hearing impairments complete telephone calls. With the opening of the TRS center in 1990, Tennessee became the fifth state to provide its speech and hearing disabled citizens with access to TRS. It is also recognized that the offering of TRS helps to promote the public policy goal of universal service. The Authority continues to recognize the importance of relay service and is committed to ensuring that the TN TRS meets or exceeds all FCC mandatory minimum standards.

AT&T provided TRS in Tennessee from its inception until September 2001 as a result of two (2) competitive bidding processes that awarded AT&T with two (2) consecutive three-year contracts, and one (1) extension contract for a two-year period.

In 2001, MCI Worldcom (“MCI”) was awarded the TRS contract for a five (5)-year period as a result of a competitive bidding process. MCI, which later became Verizon, was selected to provide relay service from September 25, 2001 to September 24, 2006 and again September 25, 2006 until September 24, 2011; based on cost factors, operational, functional and technical approaches to the provisioning of relay services. Since the transition to Verizon, TRS handles an average of 26,368 calls per month.<sup>1</sup> The TN TRS facility is located in Memphis, Tennessee and provides intrastate and interstate TRS.

Tennessee began providing CapTel Relay Services (“TN CapTel”) in 2005. As a result of a competitive bidding process Sprint was chosen to provide this service in Tennessee. The decision to choose Sprint was based on cost factors, operational, functional and technical approaches to the provisioning of CapTel services. CapTel averages 12,050 calls per month<sup>2</sup>.

## **II. The Authority's state program (TRS and CapTel) meets or exceeds all operational, technical, and functional minimum standards contained in 47 C.F.R. § 64.604.**

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<sup>1</sup> The average monthly call volume is based on the time period of January 1, 2007 to September 1, 2007.

<sup>2</sup> The average monthly call volume is based on the time period of September 1, 2006 to August 1, 2007.

*(A) Operational standards requirement.*

*(1) Communications assistant (“CA”). (i) TRS providers are responsible for requiring that CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities; (ii) and that CAs have competent skills in typing, grammar, spelling, interpretation of typewritten American Sign Language (“ASL”), and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications. (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed. (iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A “qualified interpreter” is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes. (vi) TRS providers must make best efforts to accommodate a TRS user’s requested CA gender when a call is initiated and, if transfer occurs, at the time the call is transferred to another CA. (vii) TRS shall transmit conversations between TTY and voice callers in real time.*

The Authority understands that the CA is the primary contact between the TRS and the users of relay service. The TRS is required to employ a sufficient number of supervisory personnel to oversee CAs and maintain required service levels with both CapTel and traditional TRS.

In the pre-employment process, CAs are screened to ensure they are suitable for the demands of this type of work. Supervisors are also required to meet the same qualifications and have the same training as the CAs they supervise. Due to the importance of this relationship, the Authority requires that the relay provider’s CAs be trained in all aspects of hearing and speech disabilities, cultures and language including, but not limited to, ASL, Standard English translation, cued speech, finger spelling, manual English, speech-reading and speech-amplification, as well as trained to be sensitive to the special needs of those with communication disabilities. CAs are also provided extensive training in confidentiality, ethics, emergency calls handling and relay etiquette. For Speech-to-Speech (“STS”) Communications, CAs receive training to recognize and deal with aspects of speech disability. The TN TRS exceeds the FCC mandatory minimum requirement in this area of training in the deaf culture and the aspect of speech disability in that all TRS personnel receive such training.

CAs are required to be able to type a minimum of 60 words per minute and be literate in grammar and spelling. The TN TRS exceeds this requirement in that its oral-to-type testing of CA typing speed does not incorporate technological aids. CAs are tested to determine that the requisite proficiency has been achieved. Documentation of this testing is retained by the Contractor, and may be subject to audit. CAs are also subject to ongoing training with respect to Deaf Culture, language and needs sensitively. In the case of CapTel, the voice recognition technology transmits above 100 words per minute.

The TN TRS exceeds this requirement in that its oral-to-type testing of CA typing speed does not incorporate technological aids.

The TN TRS does not currently provide VRS services.

The TN TRS CAs make every effort to remain on a call for the duration of the call. Should there be a need to change CAs, however, the change does not take place until the original CA has been on the call for a minimum of ten minutes for TRS calls and a minimum of fifteen minutes for STS calls.

The TN TRS, to the extent possible, accommodates TRS users' preference for CA and STS CA gender at the beginning of the call. If there is a change of CA or STS CA, to the extent possible, the relieving CA or STS CA is of the preferred gender. CapTel CA's are waived of this requirement.

The TN TRS CAs relay conversations between TTY and voice callers in real time. In the case of the TN CapTel; the CA's transmit audio and captioned text conversations from the voice caller to the CapTel user in real time.

*(2) Confidentiality and conversation content. (i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. § 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls. (ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all*

*conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

The TN TRS meets this mandatory minimum requirement and understands that the confidentiality of callers' identity and content of their calls is of paramount importance in relaying calls. The TN TRS has defined and adheres to strict confidentiality guidelines as set forth in this requirement.

All relay personnel must sign an annual Pledge of Confidentiality ("Pledge") to ensure understanding. Only persons who have signed the Pledge are allowed into the operations area of the TN Relay Center. The observing or listening to actual calls by anyone other than the CA handling a call is prohibited, except for training or quality assurance purposes. All allegations of confidentiality breach are immediately and thoroughly investigated, and the individual against whom an allegation is lodged is immediately placed on administrative leave during the course of the investigation. Any individual who, after investigation, is found to have violated customer confidentiality is terminated, and is not allowed to work in the TN Relay Center again.

No records of call content are kept after originating call termination with the exception of records retained at the request of an STS consumer for the completion of subsequent calls. All information relating to call content is automatically and completely erased from the CA console.

In accordance with FCC minimum standards, CAs are prohibited from intentionally altering a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs relay all conversation verbatim unless the relay user specifically requests summarization, or interpretation of an ASL call. In providing STS, CAs facilitate the call of an STS user with a speech disability to the extent requested, while enabling the user to be independent and maintain control of the conversation. The TN CapTel is waived from the STS Facilitation requirement.

The TN TRS does not currently provide VRS. At such time when VRS is made available in Tennessee, the Authority will take appropriate measures to ensure that the confidentiality of VRS users is maintained.

*(3) Types of calls. (i) Consistent with the obligations of common carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. (ii) TRS shall be capable of handling any type of call normally provided by common carriers and the burden of proving the infeasibility of handling any type of call will be placed on the carriers. (iii) Providers of TRS are permitted to decline to complete a call because credit authorization is denied. (iv) Relay services should be capable of handling pay-per-call calls. (v) TRS providers are required to provide the following types of TRS calls: (1) text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO to TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. (vi) TRS providers are required to provide the following features (1) Call release functionality; Speed dialing functionality; and (3) three-way calling functionality. (vii) Voice mail and interactive menus: CAs must alert the TRS user of the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages. (viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

CAs are prohibited from refusing to place single or sequential calls and from limiting the length of calls placed by relay users. The TN TRS is capable of handling any type of call normally provided by common carriers whether local, intraLATA, intrastate, interLATA, Interstate, International or directory assistance calls. The TN TRS billing options include authorized credit cards. Where a customer wishes to place a call billed to a credit card that is not authorized to accept charges, or where credit is denied by an authorized card service, CAs will attempt to solicit from the relay user an alternate method of billing the call.

The TN TRS platform supports outgoing calls to pay-per-call calls. It provides a toll-free 900-access number into the relay center to enable callers to access these services. The TRS system is designed to ensure that the caller is billed for any charges incurred on outgoing calls to pay-per-call numbers. Using a 900-access number provides the caller with an additional safety measure in that it preserves the 900 blocking capabilities the caller may have requested through their LEC.

The TN TRS supports all TRS call modalities; (1) text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO to TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. The TN TRS provider is required

to provide the following features (1) Call release functionality; (2) Speed dialing functionality; and (3) three-way calling functionality are available to call the TN TRS users. All of these call modalities are also available to Spanish-language callers. Further, the TN TRS platform allows callers to store up to 99 names and numbers in their speed dial profile, and allows for operator-initiated three-way calling.

The TN TRS relay platform allows the CA to record and respond to recorded messages and interactive menus. Callers are alerted to the presence of a recorded message or interactive menu by the CA through the use of a hot key. The capture-recording feature plays the message back to the CA at a variable rate that is under the CA's control. The captured announcements or messages are not retained beyond the duration of the incoming call. If charges are applicable, the caller is charged for only one call, regardless of the number of calls that may be required to completely convey or retrieve a message.

The TN TRS provides answering machine and voice mail message retrieval as a standard feature.

In the case of the TN CapTel:

These requirements for CapTel CAs are currently waived for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call. CapTel users dial sequential calls directly therefore there it is not possible for a CapTel CA to refuse sequential calls or limit length of calls.

The TN CapTel CAs are not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call.

Except where waived by the FCC, CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

*(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest Public Safety Answering Point ("PSAP"). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.*

The TN TRS exceeds the FCC's mandatory minimum standard emergency call handling in that its relay platform automatically connects to the caller's



Public Safety Answering Point by cross-referencing the caller's delivered ANI with its associated PSAP contained in the emergency directory. The TN TRS platform also automatically transmits the caller's ANI to the PSAP.

When an emergency call request is originated from a cell phone the caller is prompted to provide a physical location. The system then looks up and dials out the associated PSAP as opposed to calling the PSAP location associated with the delivered ANI.

When the CA initiates the emergency dialing feature the console is automatically placed in a "busy" or stand-by" mode while the outgoing call is being placed to the PSAP. This process retains the caller's ANI should the caller hang up before connecting to the PSAP and prevents the console from being available for an incoming call, which would erase the caller's ANI.

*(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

The TN TRS meets this FCC mandatory minimum standard. STS users can expedite their calls by simply providing the STS CA the name of the desired called person, rather than having to state the called person's phone number when placing an outbound call. STS users can add, modify or delete information in their individual Speed Dial directory. Additionally, STS users can, at their option, include their names in an STS Directory so that "speech able" callers can request an outgoing call to the STS user by giving the CA the STS user's name. Finally, STS users can access their Speed Dial list while away from their profiled ANI by using a pre-registered pass code or other pre-established personal identifier.

Currently, STS requirements are waived for the TN CapTel.

*(B) Technical standards.*

*(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.*

The TN TRS can receive and transmit in ASCII and Baudot format at the speed that is generally in use. Currently, ASCII and Baudot requirements are waived for the TN CapTel.

*(2) Speed of answer. (i) TRS shall include adequate staffing to provide callers with efficient access under projected calling volumes, so that the*

*probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. (ii) TRS shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS center's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. (A) The call is considered delivered when the relay center's equipment accepts the call from the local exchange carrier and the public switched network actually delivers the call to the TRS center. (B) Abandoned calls shall be included in the speed-of-answer calculation. (C) A provider's compliance with this rule shall be measured on a daily basis. (D) The system shall be designed to a P.01 standard. (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the relay center to relay administrators and relay centers upon request.*

The TN TRS meets and exceeds this FCC mandatory minimum standard. In meeting the requirement, the Authority requires the provider of TN's Relay Service to employ a sufficient number of supervisory personnel to oversee CAs and maintain required service levels. To achieve this goal on a daily basis, the relay provider monitors relay call traffic at a minimum of every 30 minutes. On each half-hour, switching equipment generates a summary of calls handling the previous 30-minute period. This summary includes the number of offered calls, the number of handled calls, the number of abandoned calls, the number of blocked (rejected) calls, the Average Speed of Answer, the Average Agent Time, and the Average Talk Time. These factors are used to develop projections for agent staffing based on time of day and day of week to ensure adequate staffing to answer a minimum of 85% of calls within 10 seconds.

Abandoned call counts are included in the ASA calculations. ASA is measured from the time a call reaches the CI switch and until it is answered by a CA who stands prepared to begin the process of the caller's request. At the point of receipt of the call, the CA immediately obtains the necessary information required to complete the outgoing call.

The TN Relay Center has adequate network facilities to meet the requirement of the P.01 standard for call blocking. ASA and call blocking on a daily and monthly basis is provided in the monthly reports to the Authority and is provided in Appendix A.

The TN CapTel calls are measured in a similar fashion:

For CapTel users, the number of calls that arrive at the CapTel call center will be the number of Calls Offered. The number of calls that are answered by a CA is the number of Calls Answered. The time for each call between the time the call arrives at the CapTel call center and the time answered by a CA until it is abandoned is the Speed of Answer. Any time spent in the Voice-in telephone menu is time controlled by the user to enter in the phone number of the CapTel user they are calling. This time is subtracted out from the Speed of Answer time.

*(iii) Speed of answer requirements for VRS providers are phased-in as follows. answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.*

The TN TRS scope of service does not currently include VRS.

*(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.*

The TN TRS meets this FCC mandatory minimum standard. The TN TRS provides for each caller's Inter-exchange Carrier ("IXC") of choice, to the extent that the IXC can be identified and most importantly, be willing to participate in TRS, by routing those requests to a LEC tandem that has IXC trunking. At the LEC tandem, the trunk is switched over to the designated IXC who is provided with the Originating ANI, the Terminating ANI, Info Digits, and SS7 information including Caller ID. This procedure enables the IXC to route and bill calls appropriately.

If a customer has a pre-selected IXC or indicates a preferred carrier other than the long distance carrier of the relay provider, the TN TRS is able to route calls through the callers choice of IXC.

The TN CapTel provides Tennessee callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the Tennessee Carrier of Choice ("COC") program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, and if they are, the

call will be routed accordingly. Callers are able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

If a Tennessee caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the Sprint network, who is the contracted provider of the TN CapTel.

*(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS. (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.*

The TN TRS and the TN CapTel meet this FCC mandatory minimum standard. The TN TRS provides relay services 24 hours per day, seven days per week. The TN TRS has redundancy features that are functionally equivalent to the equipment found in normal central offices. The relay facility where service is provided is protected against power outages with an uninterruptible power supply (“UPS”), a battery system, and a back-up diesel generator. This equipment is located at the facility.

In the event of an outside loss of power to the center, the battery system and UPS are designed to maintain power for up to two hours (depending on load), or until the diesel generator takes over – generally in 2 minutes or less, thereby providing long-term power. The long-term generator backup can maintain operations as long as needed with refueling. The UPS and back-up generator set support all critical functions at the center, including:

- ◆ Transmission equipment (channel banks, protection switches, radio equipment, ACD, channel service units, etc.)
- ◆ Local PBX and peripheral systems
- ◆ LAN and WAN connected devices including operator consoles and terminals, servers, gateways, Call Detail Record recording and collection systems, and communications elements
- ◆ Environmental systems including air conditioning, fire suppression, system alarms, emergency lighting systems including operator work site emergency lights.

The UPS provides support to these critical functions in the following way:

- ◆ All outside power runs directly through the UPS and battery system, and once it has flowed through the UPS, the outside power energizes the center.

- ◆ If there is a disruption in outside power, the UPS detects the disruption, and continues powering the center through the battery system, avoiding any interruption.
- ◆ Once the UPS begin delivering power to the center, it immediately utilizes the automatic transfer switch to activate the diesel generator. It takes approximately 2 minutes for the generator to start up and stabilize its output, and at that point the generator supplies power to the center in support of critical functions.

The TN TRS is designed for an overall network availability objective of 99.6 percent or better. Individual network switches, including those responsible for network call distribution, are designed to meet availability objectives of at least 99.99 percent to minimize the probability of a busy response due to loop trunk congestion. TN's TRS follows the strict internal operating standards, frequent testing, and a highly fault-tolerant hierarchical switched network design that provides multiple routing choices for all switched calls.

*(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600, et seq.*

The Authority understands and complies.

*(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.*

The TN TRS and the TN CapTel platforms incorporate SS7 technology and transmit the 10-digit number of the calling party to the public network, which is passed through to the calling party if the calling party subscribes to Caller ID services through their local telephone service provider.

*(C) Functional standards.*

*(1) Consumer complaint logs. (i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the*

*complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

The Authority, Verizon and Sprint comply with this requirement by maintaining a summary log of all complaints and by submitting the log to the FCC. The Authority submits to the FCC summaries of the log indicating the number of complaints received per the schedule prescribed by the FCC. Copies of the logs can be found in Appendix B.

*(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:*

*(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;*

*(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and*

*(iii) The physical address to which correspondence should be sent.*

The Authority and the TN TRS providers comply with this requirement. The FCC web site information regarding contact persons for the TN TRS reflects the meeting of this requirement.

*(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

A part of the TN TRS and the TN CapTel contracts require the providers to have an outreach program to conduct and participate in activities throughout

the state to focus primarily on educating the general public and potential users on the availability of relay services in the state. Radio and television promotions have been developed to achieve this objective in Tennessee. The outreach staffs of the TN CapTel and the TN TRS have independently developed and participated in statewide activities and have distributed informational brochures on an annual basis.

The Authority also includes relay information in its outreach efforts. The Authority recognized that developing partnerships with organizations that have the responsibility of assisting people with special needs would be an efficient avenue for program awareness. The Authority, with Verizon Relay Services, established an Advisory Committee comprised of TRS users from various communities and meets on a quarterly basis to discuss relevant TRS issues.

The Authority also provides information regarding the availability of TRS through its Telecommunications Devices Access Program (TDAP) and Link-up and Lifeline Telephone Assistance Programs. TDAP is the a program that provides free telecommunications equipment to persons with a significant hearing, speech and/or hearing and visional impairment such that a person cannot use the telephone effectively without the use of an assistive device. Link-up and Lifeline are two telephone assistance programs for qualifying low-income consumers.

The TN TRS access numbers are printed in telephone directories and directory assistance listings throughout Tennessee. Access to TRS is made available through the abbreviated dialing of 711. 711 service, which is universally available and uniform throughout state, was established in Tennessee in March 2000, which was before the FCC's mandatory implementation date of October 2000. Appendix C contains examples of the TN TRS and the TN CapTel brochures, outreach briefs and telephone directory pages.

*(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.*

For local calls, the calling or the called party are not charged for calls originating and terminating within the same toll-free local calling area despite the fact that the call may be routed through a relay center located outside the toll-free area. Intrastate toll calls placed through the relay center and billed to the users of the TN TRS and the TN CapTel at the same rate that would apply if the calls were being placed without the use of TRS. The

same discounts that are available to non-relay users are available to relay users. In accordance with the contract requirement, the billing records are passes on to the appropriate carrier for customer billing.

*(5) Jurisdictional separation of costs.*

*(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to § 410 of the Communications Act of 1934, as amended.*

*(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted below with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under § 64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

*(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.*

*(A) Contributions. Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.*

*(B) Contribution computations. Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request*



*authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of § 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Common Carrier Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.*

*(C) Data collection from TRS Providers. TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with Part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.*

*(D) The TRS Fund will be subject to a yearly audit performed by an independent certified accounting firm or the Commission, or both.*

*(E) Payments to TRS Providers. TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning*

*after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (5)(iii) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in § 64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with Parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.*

*(F) TRS providers eligible for receiving payments from the TRS Fund are:*

- (1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to § 64.605; or*
- (2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to § 64.604; or*
- (3) Interstate common carriers offering TRS pursuant to § 64.604.*

*(G) Any eligible TRS provider as defined in paragraph (5)(iii) (F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.*

*(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required under paragraphs (5)(iii) (A) through (J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective for a one-year period beginning the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of TRS Fund. The*

*administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM), and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall establish a non-paid, voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of advisory committee deliberations.*

*(I) Information filed with the administrator. The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Common Carrier Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (See 47 C.F.R. § 54.701), the North American Numbering Plan administration cost recovery (See 47 C.F.R. § 52.16), and the long-term local number portability cost recovery (See 47 C.F.R. § 52.32). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under § 0.459 of this Chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.*

*(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.*

*(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.*

The TN TRS and the TN CapTel comply with this FCC mandatory minimum requirement as set forth in section 64.604 C.4 and the Third TRS Report and Order of July 20, 1993. The TN TRS relay provider bills intrastate minutes

to the local exchange carrier. The interstate minutes are billed to the NECA. The Authority requires the TN TRS provider to submit an annual report on the first day of October in each year after the contract is awarded. The report must include the mandatory information as set forth by the FCC. In addition the report must include the number of staff personnel. The Authority requires the TRS provider to maintain records of all bills submitted to the local exchange carrier for compensation for relay operation. Upon reasonable notice, the TRS provider's records of all billings must be made available for inspection by the Authority during normal business hours. The Authority requires that the relay provider forward a record of each billable call to the designated billing agent within 30 days of the date such service was supplied.

*(6) Complaints.*

*(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under § 64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity. (iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:*

*(A) Final action under such state program has not been taken within:*

*(1) 180 days after the complaint is filed with such state entity; or*

*(2) A shorter period as prescribed by the regulations of such state; or*

*(B) The Commission determines that such state program is no longer qualified for certification under § 64.605.*

*(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (6)(iii) of this section within 180 days. (v) Complaint Procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.*

*(A) Informal Complaints.*

*(1) Form. An informal complaint may be transmitted to the Consumer Information Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.*

(2) *Content.* An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating § 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) *Service; designation of agents.* The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) *Review and disposition of informal complaints.*

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail).

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to subsection (v) below.

(C) *Formal Complaints.* A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, D.C. 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) *A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*

(4) *The relief sought.*

(D) *Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.*

(E) *Number of copies. An original and two copies of all pleadings shall be filed.*

(F) *Service.*

(1) *Except where a complaint is referred to a state pursuant to §64.604©(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.*

(2) *All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of § 1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.*

(G) *Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.*

(H) *Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.*

*Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.*

The TN TRS and the TN CapTel providers are required to follow up and resolve each complaint as expeditiously and thoroughly as possible. Should a complaint be filed with or escalated to the FCC, the TN TRS will comply with these minimum standards.

The TN TRS or the TN CapTel complaints filed with the Authority are investigated and resolved within ten business days, where possible. In the instances that a resolution cannot be reached within that time frame, continuous status update from the relay provider regarding the complaint is then required until the matter has been resolved.

*(7)Treatment of TRS customer information. All future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

The TN TRS and the TN CapTel do not use customer profile data for any purpose other than to connect the caller with requested called parties, and maintains the confidentiality of caller profile data in a secure database.

#### *§ 64.605 State Certification.*

*(a) State documentation. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Common Carrier Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

*(b) Requirements for certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:*

*(1) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in § 64.604;*

*(2) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state*

- program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and*
- (3) Where a state program exceeds the mandatory minimum standards contained in § 64.604, the state establishes that its program in no way conflicts with federal law.*
- (c) Certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.*
- (d) Method of funding. Except as provided in § 64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*
- (e) Suspension or revocation of certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.*
- (f) Notification of substantive change. States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.*

The TN TRS and the TN CapTel comply with this FCC mandatory minimum standard. The TN TRS and the TN CapTel method of funding does not use labeling or line itemizing in connection with the funding of the TN TRS and the TN CapTel programs. The provider of the TN TRS and the TN CapTel invoices the local exchange carrier on a monthly basis in accordance with the contract terms. The local exchange carrier must pay such invoices within 30 days of the date of the invoice.

### **III. The state program makes available adequate procedures and remedies for enforcing the state program.**

A designated person within the Consumer Services Division of the Authority handles relay complaints or concerns that are filed directly with the Authority. This person also handles complaints that are filed with the FCC.



Information regarding a contact person is provided to the FCC in accordance with 47 C.F.R. §64.604. This information is also provided to the National Association for State Relay Administration for publication where appropriate.

The TN TRS and the TN CapTel ensure that informational publication produced by the relay provider includes specific information of where a person may file a complaint or provide commendation regarding TRS.

Attached, in Appendix D, is the original order that established the TN TRS and a final copy of the TN's RFP for both the TN TRS and the TN CapTel, in Appendix E, which serves as evidence of the Authority's compliance with this FCC mandatory minimum standard.

**IV. Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.**

The TN TRS exceeds the FCC's mandatory minimum standards contained in section 64.604, in the area of Operational Standards for the following: Communications Assistants, Emergency Calls and STS Calls. These standards exceed the FCC's mandatory minimum requirements in no way conflict with the federal laws or regulations.

FCC Minimum Standard (§ 64.604)	Meets	Exceeds
(a) Operational Standards		
(1) Communications assistants		✓
(2) Confidentiality and conversation content	✓	
(3) Types of calls	✓	
(4) Handling of emergency calls		✓
(5) In-call replacement of CAs	✓	
(6) CA gender preference	✓	
(7) STS called numbers		✓
(b) Technical Standards		
(1) ASCII and Baudot	✓	
(2) Speed of Answer	✓	

(3) Equal access to interexchange carriers	✓	
(4) TRS facilities	✓	
(5) Technology	✓	
(6) Voice mail and interactive menus	✓	
(c) Functional Standards		
(1) Consumer complaint logs	✓	
(2) Contact persons	✓	
(3) Public access to information	✓	
(4) Rates	✓	
(5) Jurisdictional separation of costs	✓	
(6) Complaints	✓	
(7) Treatment of TRS customer information	✓	

**Appendix A**  
**TN TRS**  
**Call Blocking Data**  
**Speed of Answer Data**

**Appendix B**  
**TN TRS and TN CapTel**  
**Complaint Logs 2002-2007**

**Appendix C**  
**TN TRS and TN CapTel**  
**Brochures and Outreach Materials**

**Appendix D**  
**Tennessee Legislation Establishing TRS**

**Appendix E**  
**State of Tennessee TRS RFP**  
**State of Tennessee CapTel RFP**

